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2	District of Nevada
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8	Attorneys for Defendant
9	
10	UNITED STATES DISTRICT COURT
11	DISTRICT OF NEVADA
12	FATIN SAWA GANDO)
13) Case No.: 2:24-cv-01053-MDC Plaintiff,
14) UNOPPOSED MOTION FOR v. EXTENSION OF TIME
15) (FIRST REQUEST) MARTIN O'MALLEY,
16	Commissioner of Social Security,
17	Defendant.
18	
19	Defendant, Martin O'Malley, Commissioner of Social Security (Defendant), respectfully
20	requests that the Court extend the time for Defendant to respond to Plaintiff's Brief (Dkt. No. 12, filed
21	on October 3, 2024), currently due on November 4, 2024, by 30 days, through and including
22	December 4, 2024. Defendant further requests that the deadline for Plaintiff's optional reply brief be
23	extended to December 18, 2024.
24	This is Defendant's first request for an extension of time to file a response. Good cause exists
25	for this extension. Counsel is currently in the process of determining whether a settlement agreement
26	is possible in this case. Additional time is required for Defendant's undersigned counsel and

specialized attorneys within the undersigned's office to consider this option. If the case cannot be settled, then Defendant's counsel will proceed with filing Defendant's response to Plaintiff's Brief by the new due date of December 4, 2024. Counsel for Defendant advised counsel for Plaintiff of the need for this extension on October 30, 2024. Counsel for Plaintiff confirmed that Plaintiff does not object to this request.

It is therefore requested that Defendant be granted an extension of time to respond to Plaintiff's Brief, through and including December 4, 2024. This request is made in good faith and with no intention to unduly delay the proceedings.

Dated: October 30, 2024

Respectfully submitted,

JASON M. FRIERSON United States Attorney

/s/ David Priddy DAVID PRIDDY Special Assistant United States Attorney

IT IS SO ORDERE

UNITED STATES MACISTRATE JUDGE

DATED: 11-12-24

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CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, Maryland 21235. I am not a party to the above-entitled action. On the date set forth below, I caused service of UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST REQUEST) on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing: Leonard Stone Shook & Stone, Chtd. 710 S. Fourth Street Las Vegas, NV 89101 702-385-2220 Email: lstone@shookandstone.com Marc V. Kalagian Law Offices of Lawrence D. Rohlfing, Inc., CPC 12631 East Imperial Highway, Suite C-115 Santa Fe Springs, CA 90670 562-868-5886 Fax: 562-868-8868 Email: marc.kalagian@rksslaw.com

Linaii. marc.karagiand

Attorneys for Plaintiff

Dated: October 30, 2024

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/s/ David Priddy
DAVID PRIDDY
Special Assistant United States Attorney

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